

EXHIBIT A

DECLARATION OF DR. THOMAS A. DIPRETE

1. I am the Giddings Professor of Sociology at Columbia University, a faculty member of the Columbia Population Research Center, and the co-director of the Columbia Institute for Social and Economic Research and Policy and the Center for the Study of Wealth and Inequality. I previously submitted a report in this case, “Analysis of Differences in the Neighborhood Characteristics of Pickup and Delivery Locations for Black and White Drivers Employed by DHL at the Lisle, Alsip, and Franklin Park Facilities in the Chicago Region.”
2. A true and correct copy of my report that accurately reflects my qualifications, my opinions, and the bases for my opinions is attached as Exhibit A. By this declaration, I reaffirm the truth and accuracy of my report and adopt its conclusions as if they were set forth herein.
3. Using the data on which my report was based, I identified the number of package pickup and delivery stops on each route driven by black drivers that were in neighborhoods with a black density greater than 50%, the number of stops in neighborhoods with a black density greater than 70%, the number of stops in neighborhoods with a violent crime rate more than 2 standard deviations above the mean, and the number of stops in neighborhoods with a property crime rate more than 2 standard deviations above the mean. I also computed the number of times each black driver drove each route in which at least one stop exceeded each of these four thresholds. For purposes of these calculations, I used data for 2010 census tracts.
4. The following claimants each delivered or picked up packages in areas where both the violent crime rate and property crime rate were two or more standard deviations above the mean and had a population density that was at least 70% Black:
 - a. Maxwell Akenten
 - b. Philip Azor
 - c. Alma Bonslater-Burnett
 - d. Kenneth Brisco
 - e. Derwin Brown
 - f. Shurray Buffkin
 - g. Oliver Dean
 - h. Melvin Edwards
 - i. John Ellis
 - j. David Fefee
 - k. Percy Fields II
 - l. DeMarco Foster
 - m. Michael Fulks
 - n. Paul Gilbert, Sr.
 - o. Benita Green-Riley
 - p. Johann Haven

q. Jimmie Hayes
r. Philip Hopkins
s. Demario Jackson
t. Nathaniel Jackson
u. Christopher Johnson
v. J.C. Johnson
w. Joseph S. Jones
x. Anthony Jordan
y. Allan Kelly
z. Miranda Lester
aa. Michael Lowe
bb. Charles Martin
cc. Anthony McCall
dd. Aldrich McNeal, Jr.
ee. Sandra McNeely
ff. Edgar Medley
gg. Erskine Miller
hh. Alonzo Murphy
ii. Angela Perry
jj. Timothy Price
kk. Chris Quarles
ll. Willie Redd
mm. Allan Robertson
nn. Sharon Robinson
oo. John Royce Scott
pp. Millicent Shields
qq. Renard Singleton
rr. Kirby Smart
ss. Darrell Smith
tt. William Smith
uu. Gregory Stewart
vv. Loron Stewart
ww. Toxey Street
xx. Alonzo Studstill
yy. Randy Thompson
zz. Jerry Thornton
aaa. Sharee Washington
bbb. Ricky Wetherspoon
ccc. Arthur Williams, Jr.
ddd. Sandra Williams
eee. Jamaine Young

5. Claimant Thomas Britton delivered or picked up packages in areas where the violent crime rate and property crime rate were two or more standard deviations above the mean and had a population density that was between 50-70% Black.

6. Claimant Calvin Allen delivered or picked up packages in areas that had a violent crime rate of two or more standard deviations above the mean and a Black population density above 70%.
7. Claimant Robert Lyons delivered or picked up packages in areas where the property crime rates were two or more standard deviations above the mean and had a population density above 50% Black.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.



Dr. Thomas A. DiPrete

4/27/2017

Date